

EXHIBIT A

**PLAINTIFF JOE GOOCH'S
RESPONSE TO
INTERROGATORY NO. 6**

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JOE GOOCH, Individually and as §
personal representative of the Estate of §
Jody Lynn Gooch §
Plaintiff, §
§
V. § Civil Action No. 4:17-cv-01673
§
PACKAGING CORP. OF AMERICA, §
INC., and ELITE SPECIALTY §
WELDING, LLC §
Defendants, §

**PLAINTIFF, JOE GOOCH RESPONSE TO DEFENDANT,
PACKAGING CORPORATION OF AMERICA, INC.
FIRST SET OF INTERROGATORIES**

TO: Packaging Corporation of America, Inc., Defendant, by and through Defendant's attorneys of record, Eric Kuwana and Emily Rochy KATTEN MUCHIN ROSENMAN LLP 1301 McKinney St., Suite 3000 Houston, Texas 77010.

COMES NOW, Joe Gooch, Plaintiff, in the above-styled and numbered cause and files this, Plaintiff's Objections and Responses to Defendant, Packaging Corporation of America, Inc., First Set of Interrogatories under the provisions of Rule 26(a) of the Federal Rules of Civil Procedure.

Respectfully submitted,

BRENT COON & ASSOCIATES, P.C.

By: /s/ Eric W. Newell

Eric W. Newell
Texas Bar No. 24046521
215 Orleans
Beaumont, Texas 77701
Telephone: (409) 835-2666
Facsimile: (409) 835-1912

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the above and foregoing instrument has been served upon all know counsel of record my Certified Mail, Return Receipt Requested and email on this the 7^h day of June , 2018.

Ms. Emily L. Rochy
Eric Kuwana
Katten Muchin Rosenman LLP
1301 McKinney St., Suite 3000
Houston, Texas 77010

/s/ Eric W. Newell
Eric W. Newell

**PLAINTIFF JOE GOOCH'S OBJECTIONS AND RESPONSES DEFENDANT,
PACKAGING CORPORATION OF FIRST SET OF INTERROGATORIES**

INTERROGATORY NO. 1:

Identify each person who prepared or assisted in the preparation of your responses to these Interrogatories.

RESPONSE: Joe Gooch.

INTERROGATORY NO. 2:

State: (a) your full legal name; (b) every name you have used in the past; (c) the dates you have used each name.

RESPONSE: (a)-(c) Joe Edward Gooch.

INTERROGATORY NO. 3:

State: (a) each address where you have resided over the past five (5) years; and (b) the dates you resided at each address.

RESPONSE: (a)-(b) 178 Pvt. 8003 Newton, TX 75966

INTERROGATORY NO. 4:

As to your Decedent, state: (a) his full legal name; (b) every name he used in the past; (c) the dates he used each name.

RESPONSE: (a) Jody Lynn Gooch

INTERROGATORY NO. 5:

As to your Decedent, state: (a) each address where he resided over the past five (5) years; and (b) the dates he resided at each address.

RESPONSE: (a) – (b) 178 Pvt. 8003 Newton, TX 75966

INTERROGATORY NO. 6:

Identify each surviving child, spouse and parent of Jody Lynn Gooch.

RESPONSE: Derrick G. Gooch – Surviving son of Jody Lynn Gooch

Joe E. Gooch – Surviving father of Jody Lynn Gooch

Evelyn Taber – Surviving mother of Jody Lynn Gooch